

**IN THE UNITED STATES DISTRICT COURT FOR
THE MIDDLE DISTRICT OF ALABAMA
EASTERN DIVISION**

UNITES STATES OF AMERICA)	
)	CASE NO. 3:05-CR-234-A
v.)	
)	
TYRONE WHITE)	

MOTION FOR PROTECTIVE ORDER

COMES NOW the Defendant TYRONE WHITE, by and through his attorney, Julian L. McPhillips, Jr., and respectfully moves this Honorable Court for an ORDER protecting the eleven witnesses named in *Defendant's Motion to Dismiss Indictment and For Sanctions* (Doc. 39), from any contact by the Auburn Police Department, any federal agency or the United States Attorney's Office, without the undersigned, or his representative, present.

1. As set forth in *Defendant's Motion to Dismiss Indictment and For Sanctions* (Doc. 39), the Auburn Police Department, acting in conjunction with, or at the behest of, the federal government, threatened and intimidated witnesses, including the persons named in said motion.

2. The identities of the eleven affiants were necessarily revealed in the aforesaid motion, leaving them exposed to retaliation and further harassment by the government. Particularly in light of the allegations against the government, that it used threatening and intimidating tactics with these individuals, an order protecting these named affiants is both proper and necessary, lest they be further harassed by the very governmental entities upon which they have effectively "blown the whistle."

3. The government should not be prejudiced or hindered in its **legitimate** inquiries of these people, by the mere requirement that the undersigned be present if they choose to contact these affiants.

WHEREFORE, above premises considered, the undersigned prays that this Honorable Court will ORDER protected, the eleven named affiants in *Defendant's Motion to Dismiss Indictment and For Sanctions* (Doc. 39), from any contact by the Auburn Police Department, any federal agency, or the United States Attorney's Office, outside the presence of the undersigned, or his representative.

RESPECTFULLY SUBMITTED this 17th day of November 2005,

TYRONE WHITE
Defendant

/s/ Julian L. McPhillips, Jr.
JULIAN L. McPHILLIPS, JR.
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CERTIFICATE OF SERVICE

I certify that, on this date, I have served a copy of the foregoing upon the Government by electronic filing, and by mailing an additional courtesy copy of same to the Government's attorneys at the addresses below:

Todd A. Brown
Assistant United States Attorney
One Court Square, Room 201
P.O. Box 197
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/s/ Julian L. McPhillips, Jr.
JULIAN L. McPHILLIPS, JR.
Attorney for Defendant